

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

**DEBTORS' JOINDER TO MOTION TO QUASH LAVVAN INC.'S
NOTICE OF DEPOSITION OF JOHN DOERR**

The above-captioned debtors and debtors-in-possession (the “Debtors”) hereby join (this “Joinder”) in the *Motion to Quash Lavvan Inc.’s Notice of Deposition of John Doerr* [Docket No. 417] (the “Motion to Quash”)² and, in support thereof, respectfully state as follows:

JOINDER

1. The Debtors join in the Motion to Quash filed by Foris, for themselves and on behalf of John Doerr (“Mr. Doerr”). None of the Debtors, Foris, or Lavvan has—even to date—identified Mr. Doerr as a witness to appear at the Continued Hearing on Wednesday, October 4. The Debtors will not be calling Mr. Doerr at a witness at the Continued Hearing and nor will Foris. Moreover, Lavvan has not only not identified Mr. Doerr as a witness at the Continued Hearing, even if it had, Lavvan has not, to the Debtors’ knowledge, served a subpoena pursuant to Federal Rule of Civil Procedure 45 upon Mr. Doerr in an attempt to direct his appearance at the Continued Hearing.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion to Quash.

2. Accordingly, the Deposition Notice serves no relevant purpose with respect to the matters to be actually considered at the Continued Hearing. Further, the proposed date of Mr. Doerr's deposition—one day before the Continued Hearing—falls well outside the Court-ordered deadline for the completion of depositions pursuant to the Scheduling Order.

CONCLUSION

3. For the reasons set forth above, the Debtors join in the Motion to Quash and respectfully request that the Court enter the Proposed Order.

Dated: October 2, 2023

PACHULSKI STANG ZIEHL & JONES LLP

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